

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in compliance with D.N.J. LBR 9004-1(b)**

**PACHULSKI STANG ZIEHL & JONES LLP**

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*Counsel to Arnold & Itkin LLP*

In re:

LTL MANAGEMENT LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 21-30589 (MBK)

**DECLARATION OF LAURA DAVIS JONES**

Pursuant to 28 U.S.C. § 1746, I, Laura Davis Jones, Esq., declare under penalty of perjury as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), located at 919 North Market Street, 17<sup>th</sup> Floor, Wilmington, Delaware 19801, and

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

have been duly admitted to practice law in the State of Delaware, the United States District Court for the District of Delaware, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court.

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. I submit this Declaration in support of the Motion of Arnold & Itkin LLP on Behalf of Certain Talc Personal Injury Claimants to Dismiss this Chapter 11 Case pursuant to 11 U.S.C. § 1112(b) and Rule 1017 of the Federal Rules of Bankruptcy Procedure (the “**Motion**”).<sup>2</sup>

4. A true and correct copy of the Johnson & Johnson press release, *Johnson & Johnson Announces Plans to Accelerate Innovation, Serve Patients and Consumers and Unlock Value Through Intent to Separate Consumer Health Business*, dated November 12, 2021 is attached hereto as **Exhibit A**.

5. A true and correct copy of portions of the Hearing Transcript dated November 10, 2021 cited in the Motion is attached hereto as **Exhibit B**.

6. A true and correct copy of portions of the J&J Quarterly Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the quarterly period ended October 3, 2021 cited in the Motion is attached hereto as **Exhibit C**.

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<sup>2</sup> Capitalized terms used and not otherwise defined herein have the meanings ascribed thereto in the Motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration on December 9, 2021 at Wilmington, Delaware.

By: /s/ Laura Davis Jones  
Laura Davis Jones